

August 20, 2002

Elizabeth J. Moran, Ph.D.
American Chemistry Council Olefins Panel
Panel Manager
1300 Wilson Boulevard
Arlington, VA 22209

Dear Dr. Moran:

We have conducted a review of the Low Benzene Naphtha category submitted by the Olefins Panel as part of their commitment made under the HPV Challenge Program. Our analysis focused initially on the category justification and implementation strategy with the aim of determining the feasibility of achieving the stated objective of characterizing members of this group with the proposed design.

Our analysis concluded that, while the category proposal appears to be a reasonable approach to characterize process streams from the ethylene process unit, the implementation strategy was difficult to grasp. The organization and presentation of data in the document should be improved to increase clarity and facilitate analysis. For example, there is no explicit relationship between the CAS numbers comprising the category and the different streams. Similarly, there is no linkage between chemicals for which data are presented (the eight robust summaries provided - all with CAS # 64742-48-9)) and the stream that this chemical represents. Finally, although we encourage referring to data in other HPV submissions (and the OECD SIDS program), it is important to identify how those data fit into the category matrix for read-across purposes (e.g., Table 10 does not indicate whether or how such data will be used).

I encourage the Olefins Panel to take the necessary steps to make this category viable. We are prepared to proceed to data adequacy determinations as soon as we get your response.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the HPV Challenge Program Web site "Submit Technical Questions" button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

Sincerely,

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Oscar Hernandez, Director
Risk Assessment Division